

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

RACHEL RAMSBOTTOM, et al.,

Plaintiffs,

v.

LORIN ASHTON, et al.

Defendants.

CIVIL ACTION

No.: 3:21-CV-00272

JURY TRIAL DEMANDED

**DEFENDANT RED LIGHT MANAGEMENT, LLC'S
MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT**

Defendant Red Light Management, LLC ("Red Light") respectfully moves this Court to dismiss Plaintiffs' Amended Complaint pursuant to Federal Rule of Civil procedure 12(b)(6). As more fully set forth in Defendant's accompanying Memorandum in Support of Defendant Red Light's Motion to Dismiss, Plaintiffs' Amended Complaint should be dismissed since it fails to state a claim upon which relief can be granted against Red Light because:

- (i) It does not and cannot plead a single affirmative act by Red Light to facilitate or otherwise assist, *i.e.*, participate in, the alleged Illegal Venture because Red Light did not represent Defendant Lorin Ashton at the time the alleged Illegal Venture allegedly damaged the Plaintiffs and therefore, the Complaint also fails to include a single allegation that Red Light undertook such act knowingly;
- (ii) It does not include a single allegation that Red Light benefitted, financially or by receiving anything of value, from the alleged Illegal Venture and therefore, the Complaint also fails to include a single allegation that Red Light knowingly accepted benefits arising from the alleged Illegal Venture;
- (iii) It states, in impermissibly conclusory terms, that Red Light knew or should have known Ashton was committing violations under the Act. Even accepting this allegation as true, it wholly fails to state a plausible TVPRA claim against Red Light because there are no facts even remotely suggesting Red Light knew or should have known that the venture it allegedly

knowingly supported and allegedly knowingly benefited from was sex trafficking.

For these reasons, Red Light respectfully requests that the Court dismiss Plaintiffs' Amended Complaint against it.

Respectfully submitted,

RED LIGHT MANAGEMENT, LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document is being served through the Court's Electronic Filing System, or via U.S. Mail, first class postage prepaid, to all other parties on July 12, 2021:

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